Title Page

Facility I.D.#: 144455 Revision #: DRAFT Date: November 20, 2009

#### **FACILITY PERMIT TO OPERATE**

#### LIFOAM INDUSTRIES, LLC 2340 E 52ND ST VERNON, CA 90058

#### **NOTICE**

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER
Ву
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

Table of Content
Facility I.D.#: 144455
Revision #: DRAFT
Date: November 20, 2009 DRAFT

## **FACILITY PERMIT TO OPERATE** LIFOAM INDUSTRIES, LLC

## TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	DRAFT	11/20/2009
В	RECLAIM Annual Emission Allocation	DRAFT	11/20/2009
C	Facility Plot Plan	TO BE DEVELO	PED
D	Facility Description and Equipment Specific Conditions	DRAFT	11/20/2009
E	Administrative Conditions	DRAFT	11/20/2009
F	RECLAIM Monitoring and Source Testing Requirements	DRAFT	11/20/2009
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	DRAFT	11/20/2009
Н	Permit To Construct and Temporary Permit to Operate	DRAFT	11/20/2009
I	Compliance Plans & Schedules	DRAFT	11/20/2009
J	Air Toxics	DRAFT	11/20/2009
K	Title V Administration	DRAFT	11/20/2009
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	DRAFT	11/20/2009
В	Rule Emission Limits	DRAFT	11/20/2009

Section A Page 1
Facility I.D.#: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### **SECTION A: FACILITY INFORMATION**

LEGAL OWNER &/OR OPERATOR: LIFOAM INDUSTRIES, LLC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 2340 E 52ND ST

VERNON, CA 90058-3444

MAILING ADDRESS: 2340 E 52ND ST

VERNON, CA 90058-3444

RESPONSIBLE OFFICIAL: DENNIS BEVANS

TITLE: GENERAL MANAGER

TELEPHONE NUMBER: (323) 587-1934

CONTACT PERSON: DENNIS BEVANS

TITLE: GENERAL MANAGER

TELEPHONE NUMBER: (323) 587-1934

TITLE V PERMIT ISSUED: February 13, 2009

TITLE V PERMIT EXPIRATION DATE: February 12, 2014

TITLE V	RECLAIM	RECLAIM		
YES	NOx:	YES		
	SOx:	NO		
	CYCLE:	2		
	ZONE:	COASTAL		

Section D Page: 1
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
System 1 : POLYSTYRENE	BEAD I	PRE-EXPAN	SION SYSTEM I	NO. 1	
LOADING ARM, VACUUM LOADING, VACUUM LOADER NO. 1, POLYSTYRENE BEADS A/N:	D2	C125			
HOPPER, RECEIVING, POLYSTYRENE BEADS A/N:	D97	C125			
HOPPER, WEIGH, POYSTYRENE BEADS A/N:	D98	C125			
FOAM EXPANSION, EPS BEAD EXPANDER NO. 1, SME A/N:	D3	C109 C125		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	B163.1, D29.4, E17.1, K67.1
HOPPER, COLLECTING, POLYSTYRENE BEADS/RECYCLED SCRAP A/N:	D99	C125			
System 2 : POLYSTYRENE	BEAD I	PRE-EXPAN	SION NO. 2		
LOADING ARM, VACUUM LOADING, VACUUM LOADER NO. 2, POLYSTYRENE BEADS A/N:	D5	C125			
HOPPER, RECEIVING, POLYSTYRENE BEADS A/N:	D100	C125			
HOPPER, WEIGH, POLYSTYRENE BEADS A/N:	D101	C125			

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 2 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
FOAM EXPANSION, EPS BEAD EXPANDER NO. 2, SME A/N:	D6	C109 C125		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	B163.1, D29.4, E17.2, K67.1
HOPPER, COLLECTING, POLYSTYRENE BEADS/RECYCLED SCRAP A/N:	D102	C125			
System 3 : POLYSTYRENE	BEAD I	PRE-EXPAN	SION SYSTEM !	NO. 3	
HOPPER, RECEIVING, POLYSTYRENE BEADS A/N:	D133				
CONVEYOR, SCREW TYPE, POLYSTYRENE BEADS A/N:	D134				
HOPPER, CHARGING, POLYSTYRENE BEADS A/N:	D135				
HOPPER, WEIGH, POLYSTYRENE BEADS A/N:	D136				
FOAM EXPANSION, EPS BEAD EXPANDER NO. 3, HIRSCH 6000 XXL A/N:	D137	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	B163.1, D29.4, E17.1, E17.2, K67.1

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 3
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
System 4 : PRE-EXPANDE	D POLYS	STYRENE B	EADS AGING/S	FABILIZATION SYSTI	EM
STORAGE SILO, NO. 1, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 10 FT; HEIGHT: 10 FT; LENGTH: 10 FT A/N:	D13	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 2, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 10 FT; HEIGHT: 10 FT; LENGTH: 10 FT A/N:	D14	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 3, PRE- EXPANDED POLYSTYRENE BEADS, WOOD SILO, WIDTH: 10 FT; HEIGHT: 16 FT; LENGTH: 10 FT A/N:	D16	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 4, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D17	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 5, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D18	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 4
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
STORAGE SILO, NO. 6, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D19	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 7, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D20	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 8, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D21	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 9, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D22	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 10, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 8 FT; HEIGHT: 10 FT; LENGTH: 9 FT A/N:	D23	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 11, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 8 FT; HEIGHT: 10 FT; LENGTH: 9 FT A/N:	D24	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 5
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
STORAGE SILO, NO. 12, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 8 FT; HEIGHT: 10 FT; LENGTH: 9 FT A/N:	D25	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 13, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 10 FT; HEIGHT: 10 FT; LENGTH: 10 FT A/N:	D26	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 14, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 10 FT; HEIGHT: 10 FT; LENGTH: 10 FT A/N:	D27	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 15, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D28	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 16, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D29	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 17, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D30	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

See App B for Emission Limits

(7) Denotes NSR applicability limit

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 6 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
STORAGE SILO, NO. 18, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D31	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 19, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D32	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 20, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D33	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 21, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D34	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 22, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D35	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 23, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D36	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 7 Facility I.D.: 144455 DRAFT Revision #: Date: November 20, 2009

## **FACILITY PERMIT TO OPERATE** LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
STORAGE SILO, NO. 24, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D37	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 25, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D38	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 26, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D39	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 27, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D138	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 28, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D139	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 29, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D140	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

Denotes RECLAIM concentration limit (3) (5)(5A)(5B) Denotes command and control emission limit

Denotes NSR applicability limit

See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>(1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 8
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
STORAGE SILO, NO. 30, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D141	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 31, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D142	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 32, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D143	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 33, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D144	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 34, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D145	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 35, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D146	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994; RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Page: 9 Section D Facility I.D.: 144455 DRAFT Revision #: Date: November 20, 2009

## **FACILITY PERMIT TO OPERATE** LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
STORAGE SILO, NO. 36, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D147	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 37, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D148	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 38, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D149	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 39, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D150	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 40, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D151	C109		PM: (9) [RULE 405,2-7-1986]; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 41, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D152	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2

Denotes RECLAIM concentration limit (3) (5)(5A)(5B) Denotes command and control emission limit

See App B for Emission Limits

Denotes NSR applicability limit

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>(1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 10 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: POLYSTYRENE	FOAM	EXPANSION	NAND MOLDIN	G	P13.1
STORAGE SILO, NO. 42, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D153	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 43, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D154	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
STORAGE SILO, NO. 44, PRE- EXPANDED POLYSTYRENE BEADS, SOLID BAG, WIDTH: 7 FT; HEIGHT: 8 FT; LENGTH: 7 FT A/N:	D155	C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4, D323.1, E193.2
System 5 : PNEUMATIC CO	DNVEYL	NG SYSTEM	I	1	
CONVEYOR, PNEUMATIC, PRE- EXPANDED POLYSTYRENE BEADS A/N:	D7				
CONVEYOR, PNEUMATIC, PRE- EXPANDED POLYSTYRENE BEADS A/N:	D8				
CONVEYOR, PNEUMATIC, STABILIZED POLYSTYRENE BEADS A/N:	D9				
CONVEYOR, PNEUMATIC, STABILIZED POLYSTYRENE BEADS A/N:	D10				

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>(2)(2</sup>A)(2B) Denotes RECLAIM emission rate

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 11
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	E FOAM	EXPANSION	AND MOLDIN	G	P13.1
CONVEYOR, PNEUMATIC, 7.5 HP, PRE-EXPANDED POLYSTYRENE BEADS A/N:	D156				
System 8 : SHAPE MOLDI	NG NO. 7	7			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, FABRIC BAG A/N:	D47			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, NON-VACUUM MOLDING, MFI 103 A/N:	D48	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 10 : SHAPE MOLD	ING NO.	6	1		
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, FABRIC BAG A/N:	D51			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, NON-VACUUM MOLDING, MFI 107 A/N:	D52	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 13 : SHAPE MOLD	ING NO.	3			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, FABRIC BAG A/N:	D57			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, NON-VACUUM MOLDING, SME A/N:	D58	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 12
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	NAND MOLDIN	G	P13.1
System 15 : SHAPE MOLDI	NG NO.	2			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, FABRIC BAG A/N:	D61			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, NON-VACUUM MOLDING, P20 A/N:	D62	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 16 : SHAPE MOLDI	NG NO.	4			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, TWO TOTAL, METAL A/N:	D157			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HS1400 BV1-W1437 A/N:	D158	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 19 : SHAPE MOLDI	NG NO.	8			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D69			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, KURT 810 WITH TWO 7.5 VACUUM PUMPS A/N:	D70	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 13
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	NAND MOLDIN	G	P13.1
System 20 : SHAPE MOLDI	NG NO.	1			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D71			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, KURT 1012 WITH TWO 7.5 VACUUM PUMPS A/N:	D72	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 25 : SHAPE MOLDI	NG NO.	15	1		
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D86			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE1200 WITH ONE 5.5 H.P. VACUUM PUMP A/N:	D87	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 26 : SHAPE MOLDI	NG NO.	16	1	1	
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D88			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE1200 WITH ONE 5.5 VACUUM PUMP A/N:	D89	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 14
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
System 27 : SHAPE MOLDI	NG NO.	14			
HOPPER, DUMP, TWO, STABILIZED PRE-EXPANDED POLYSTYRENE BEADS, METAL A/N:	D90			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1500 WITH ONE 5.5 VACUUM PUMP A/N:	D91	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 28 : SHAPE MOLDI	NG NO.	17			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D92			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1200 WITH ONE 5.5 VACUUM PUMP A/N:	D93	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 30 : SHAPE MOLDI	NG NO.	18			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D95			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1200 WITH ONE 5.5 VACUUM PUMP A/N:	D96	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

 Section D
 Page: 15

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	N AND MOLDIN	G	P13.1
System 31 : SHAPE MOLDI	NG NO.	9			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D111			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 800 A/N:	D112	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 32 : SHAPE MOLDI	NG NO.	10			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D113			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 800 A/N:	D114	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 33 : SHAPE MOLDI	NG NO.	5			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D115			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1400 A/N:	D116	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 16
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
System 34 : SHAPE MOLDI	NG NO.	11			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D117			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1400 A/N:	D118	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 35 : SHAPE MOLDI	NG NO.	13		1	
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, METAL A/N:	D119			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1200 A/N:	D120	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 36 : SHAPE MOLDI	NG NO.	12			
HOPPER, DUMP, STABILIZED PRE- EXPANDED POLYSTYRENE BEADS, TWO TOTAL, METAL A/N:	D121			PM: (9) [RULE 405,2-7-1986]	D323.1
PRESS, VACUUM MOLDING, HIRSCH, MODEL NO. HE 1400 A/N:	D122	C109		VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D29.4
System 37 : POLYSTYRENE	E SCRA	P RECOVER	Y		
GRINDER, SCRAP A/N:	D123			PM: (9) [RULE 405,2-7-1986]	D323.1

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 17
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : POLYSTYRENE	FOAM	EXPANSION	AND MOLDIN	G	P13.1
SCREEN, SCRAP A/N:	D124			PM: (9) [RULE 405,2-7-1986]	D323.1
STORAGE SILO, SCRAP A/N:	D40	C125			
Process 2 : AIR POLLUTIO	N CON	FROL			
System 1: AIR POLLUTIO	N CONT	TROL SYSTE	EM .		
OXIDIZER, SHIP & SHORE ENVIRONMENTAL INC, NATURAL GAS, WITH A 50 HP MAIN BLOWER AND A 5 HP COMBUSTION AIR BLOWER, WITH LOW NOX BURNER, 3 MMBTU/HR WITH A/N:	C109	D3 D6 D13 D14 D16 D17 D18 D19 D20 D21 D22 D23 D24 D25 D26 D27 D28 D29 D30 D31 D32 D33 D34 D35 D36 D37 D38 D39 D48 D52 D58 D62 D70 D72 D87 D89 D91 D93 D96 D112 D114 D116	NOX: PROCESS UNIT**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407,4-2-1982]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,5-6-2005]; PM10: 0.1 GRAINS/SCF NATURAL GAS (5A) [RULE 409,8-7-1981]  VOC: (9) [RULE 1175,5-13-1994; RULE 1175,9-7-2007]	D29.4, E73.1, E193.1, E193.3
		D118 D120 D122 C125 D137 D138 D139 D140 D141 D142 D143 D144 D145 D146 D147 D148 D149			

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

 Section D
 Page: 18

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : AIR POLLUTIO	N CONT	ROL			
		D150 D151 D152 D153 D154 D155 D158			
BURNER, NATURAL GAS, MAXON, LO-NOX BURNER, 3 MMBTU/HR					
BLOWER, BOOSTER, 2 TOTAL, EACH 2 HP, VENTING PRE- EXPANDER NOS. 1 AND 2					
BLOWER, BOOSTER, 5 HP, VENTING STORAGE SILO NOS. 10 THROUGH 44					
BLOWER, BOOSTER, 1 HP, VENTING STORAGE SILO NOS. 1 THROUGH 9					
ENCLOSURE, POLYSTYRENE BEAD PRE-EXPANSION, 3 FLOOR SWEEPS, 50 CFM EACH I/N:	C125	D2 D3 D5 D6 D40 D97 D98 D99 D100 D101 D102 C109		PM: (9) [RULE 405,2-7-1986] ; VOC: (9) [RULE 1175,5-13- 1994;RULE 1175,9-7-2007]	D12.3, D29.4, D323.1

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 19
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3: EXTERNAL CO	MBUSTI	ON			
System 1 : BOILER					
BOILER, JOHNSTON, FIRE TUBE TYPE, MODEL PFTX-400-4-150S, NATURAL GAS WITH A/N:	D128		NOX: LARGE SOURCE**	CO: 2000 PPMV (5A) [RULE 407,4-2-1982]; CO: 50 PPMV (4) [RULE 1303(a)(1)-BACT,5-10-1996; RULE 1303(a)(1) – BACT,12-6-2002]  CO: 400 PPMV (5) [RULE 1146,9-5 – 2008]; NOX: 12 PPMV (3) [RULE 2012,5-6-2005]; NOX: 12 PPMV (4) [RULE 2005,5-6-2005]  PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]; PM: (9) [RULE 404,2-7-1986; RULE 405,2-7-1986]	C1.2, D323.1, D328.1, H23.4
BURNER, JOHNSTON, MODEL JNL 17-40, LOW NOX BURNER, 16.8 MMBTU/HR					
Process 4 : RULE 219 EXEM	ирт EQU	ЛРМЕНТ S	UBJECT TO SO	URCE SPECIFIC RULI	ES
RULE 219 EXEMPT EQUIPMENT, DRYER, SPACE HEATER, SCAQMD RULE 1146.2 TYPE 1, NATURAL GAS, 0.15 MMBTU/HR	E81				H23.2

 <sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor
 (2)(2A)(2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5)(5A)(5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See Section J for NESHAP/MACT requirements

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 20 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 4 : RULE 219 EXEM	MPT EQI	JIPMENT S	UBJECT TO SO	URCE SPECIFIC RULI	<b>IS</b>
RULE 219 EXEMPT EQUIPMENT, DRYER, SPACE HEATER, SCAQMD RULE 1146.2 TYPE 1, NATURAL GAS, 0.15 MMBTU/HR	E85				H23.2
RULE 219 EXEMPT EQUIPMENT, SCREEN PRINTING EQUIPMENT, PRINTING EQUIPMENT, WITH RELATED COATING, LAMINATING AND DRYING EQUIPMENT	E126			VOC: (9) [RULE 1130.1,12-13-1996;RULE 1171,11-7-2003;RULE 1171,2-1-2008]	H23.3
RULE 219 EXEMPT EQUIPMENT, WATER HEATERS, SCAQMD RULE 1146.2 TYPE 1	E127				H23.2

(3) Denotes RECLAIM concentration limit (5)(5A)(5B) Denotes command and control emission limit

(7) Denotes NSR applicability limit

(9) See App B for Emission Limits

(2)(2A)(2B) Denotes RECLAIM emission rate

(4) Denotes BACT emission limit

(6) Denotes air toxic control rule limit

(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

<sup>\* (1)(1</sup>A)(1B) Denotes RECLAIM emission factor

<sup>\*\*</sup> Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

Section D Page: 21 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

**SECTION D: DEVICE ID INDEX** 

The following sub-section provides an index to the devices that make up the facility description sorted by device ID.

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

Device Index For Section D							
Device ID	Section D Page No.	Process	System				
D2	1	1	1				
D3	1	1	1				
D5	1	1	2				
D6	2	1	2				
D7	10	1	5				
D8	10	1	5				
D9	10	1	5				
D10	10	1	5				
D13	3	1	4				
D14	3	1	4				
D16	3	1	4				
D17	3	1	4				
D18	3	1	4				
D19	4	1	4				
D20	4	1	4				
D21	4	1	4				
D22	4	1	4				
D23	4	1	4				
D24	4	1	4				
D25	5	1	4				
D26	5	1	4				
D27	5	1	4				
D28	5	1	4				
D29	5	1	4				
D30	5	1	4				
D31	6	1	4				
D32	6	1	4				
D33	6	1	4				
D34	6	1	4				
D35	6	1	4				
D36	6	1	4				
D37	7	1	4				
D38	7	1	4				
D39	7	1	4				
D40	17	1	37				
D47	11	1	8				

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

	Device Index For Section D		
Device ID	Section D Page No.	Process	System
D48	11	1	8
D51	11	1	10
D52	11	1	10
D57	11	1	13
D58	11	1	13
D61	12	1	15
D62	12	1	15
D69	12	1	19
D70	12	1	19
D71	13	1	20
D72	13	1	20
E81	19	4	0
E85	20	4	0
D86	13	1	25
D87	13	1	25
D88	13	1	26
D89	13	1	26
D90	14	1	27
D91	14	1	27
D92	14	1	28
D93	14	1	28
D95	14	1	30
D96	14	1	30
D97	1	1	1
D98	1	1	1
D99	1	1	1
D100	1	1	2
D101	1	1	2
D102	2	1	2
C109	17	2	1
D111	15	1	31
D112	15	1	31
D113	15	1	32
D114	15	1	32
D115	15	1	33
D116	15	1	33

 Section D
 Page: 24

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D117	16	1	34
D118	16	1	34
D119	16	1	35
D120	16	1	35
D121	16	1	36
D122	16	1	36
D123	16	1	37
D124	17	1	37
C125	18	2	1
E126	20	4	0
E127	20	4	0
D128	19	3	1
D133	2	1	3
D134	2	1	3
D135	2	1	3
D136	2	1	3
D137	2	1	3
D138	7	1	4
D139	7	1	4
D140	7	1	4
D141	8	1	4
D142	8	1	4
D143	8	1	4
D144	8	1	4
D145	8	1	4
D146	8	1	4
D147	9	1	4
D148	9	1	4
D149	9	1	4
D150	9	1	4
D151	9	1	4
D152	9	1	4
D153	10	1	4
D154	10	1	4
D155	10	1	4
D156	11	1	5

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D157	12	1	16
D158	12	1	16

Section D Page: 26
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

#### **FACILITY CONDITIONS**

F1.1 The operator shall limit the production rate to no more than 270 ton(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as polystyrene beads.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

- F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - (a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
  - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Monthly usage of polystyrene beads in tons.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

Section D Page: 27
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

#### **PROCESS CONDITIONS**

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1175

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Processes subject to this condition: 1]

#### **DEVICE CONDITIONS**

#### **B.** Material/Fuel Type Limits

Section D Page: 28
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

B163.1 The operator shall not use raw materials containing the following:

Raw polystyrene beads with a blowing agent content exceeding 6.1% by weight

To demonstrate compliance with this condition, records of the blowing agent content for all raw beads used in this equipment shall be kept in a format acceptable by the District and made available to the Executive Office or his representative upon request. The records shall consist of the manufacturer's Certificate Analysis identified in the lot tickets or the laboratory results from the testing performed in accordance with District Method 306-91.

If the laboratory test results are used as the method of compliance demonstration for any raw beads that have a lot ticket showing a blowing agent content exceeding 6.1% by weight, the operator shall perform the testing of blowing agent content for such beads in accordance with District Method 306-91 by an independent laboratory pursuant to Rule 304. The testing shall be performed at least once every quarter of each calendar year.

Once the operator has tested a batch of raw beads with the same ticket number and demonstrated compliance with the blowing agent content requirement, any un-tested raw beads from the same supplier purchased in the same quarter are deemed to be in compliance if the blowing agent content in the lot ticket for the un-tested beads is lower than the blowing agent content in the lot ticket for the tested beads.

If a batch of raw beads with the same ticket number is tested and used in two consecutive quarters, only one test is required for such beads.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: D3, D6, D137]

#### C. Throughput or Operating Parameter Limits

C1.2 The operator shall limit the fuel usage to no more than 6,794,666 cubic feet per month.

To comply with this condition, the operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the boiler.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition: D128]

Section D Page: 29 Facility I.D.: 144455 DRAFT Revision #: Date: November 20, 2009

## **FACILITY PERMIT TO OPERATE** LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

#### **D.** Monitoring/Testing Requirements

D12.3 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure between the interior and exterior of the enclosure.

The differential pressure gauge shall be installed at a location with the least amount of air turbulence.

The enclosure shall be under negative air pressure.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: C125]

Section D Page: 30
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D29.4 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
VOC	Method(s) specified in District Rule 1175	District-approved averaging time	Protocol to indicate test loacations for collection efficiency demonstration
VOC	Method(s) specified in District Rule 1175	District-approved averaging time	Inlet and outlet simultaneously of oxidizer

The test shall be conducted to demonstrate compliance with Rule 1175(c)(2).

The test(s) shall be conducted at least once every five years.

Source test shall be conducted when the polystyrene foam expansion and molding process is operating at the maximum steady-state rate.

Source test shall be conducted in accordance with the equipment configuration and operation specified in the test protocol approved in writing by the District.

In addition to the source test requirements of Section E of this facility permit, the facility permit holder shall submit the protocol to the AQMD engineer by January 1, 2013 unless otherwise approved in writing by the District, and notify the District of the date and time of the test at least 10 days prior to the test.

The test shall be conducted by July 1, 2013 unless otherwise approved in writing by the District.

The operator shall also provide to the District a source test report containing, at a minimum, the following information:

Required Data	Reported As
Collection efficiency of emission collection system	Under actual test condition
Destruction efficiency of oxidizer	Under actual test condition
VOC emissions in ppmV and lbs/hr to support collection efficiency and destruction efficiency results	Under actual test condition
Operating temperature of oxidizer	

 Section D
 Page: 31

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Operating differential pressures of the two storage silo Booster Blowers

The maximum raw bead blowing agent content processed

The residual blowing agent content in product

Amount of Pre-puff beads stored in the aging silos prior to, during and after the source test

Degrees Fahrenheit Inches of water columns

Lbs blowing agent per 100 lbs raw material processed

Lbs blowing agent per 100 lbs raw material processed

Under actual test condition

The source test shall be conducted when this equipment is operating at a temperature of not less than the minimum operating temperature specified in this permit. If the operating temperature during the source test is greater than the minimum operating temperature specified in this permit, the minimum operating temperature may be increased to reflect the operating temperature during the source test.

Not withstanding the requirements of Section E conditions, the source test results shall be submitted to the District no later than 60 days after the source test was conducted.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D3, D6, D13, D14, D16, D17, D18, D19, D20, D21, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D38, D39, D48, D52, D58, D62, D70, D72, D87, D89, D91, D93, D96, C109, D112, D114, D116, D118, D120, D122, C125, D137, D138, D139, D140, D141, D142, D143, D144, D145, D146, D147, D148, D149, D150, D151, D152, D153, D154, D155, D158]

 Section D
 Page: 32

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

#### [RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D13, D14, D16, D17, D18, D19, D20, D21, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D38, D39, D47, D51, D57, D61, D69, D71, D86, D88, D90, D92, D95, D111, D113, D115, D117, D119, D121, D123, D124, C125, D128, D138, D139, D140, D141, D142, D143, D144, D145, D146, D147, D148, D149, D150, D151, D152, D153, D154, D155, D157]

Section D Page: 33
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

## FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with CO concentration limits. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D128]

#### E. Equipment Operation/Construction Requirements

E17.1 The operator shall not use more than 1 of the following items simultaneously:

Device ID: D3 [Pre-Expander No.1]

Device ID: D137 [Pre-Expander No. 3]

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: D3, D137]

Section D Page: 34
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E17.2 The operator shall not use more than 1 of the following items simultaneously:

Device ID: D6 [Pre-Expander No. 2]

Device ID: D137 [Pre-Expander No. 3]

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: D6, D137]

E73.1 Notwithstanding the requirements of Section E conditions, the operator is not required to use the RTO to control emissions from aging silos during the RTO maintenance period:

The RTO maintenance (consisting of filter replacement and filter chamber clean-up) period shall not exceed one hour per week and shall only be performed when the pre-expanders and molding equipment have been shut down for at least 72 hours.

The exhaust booster blowers venting aging silos shall not be in operation during RTO maintenance period.

The operator shall maintain at least one set of replacement filters on site.

Materials collected from the filters and the filter chamber shall be discharged only into enclosed containers or returned to process and shall not be handled in a manner that may result in the re-release of collected materials to the atmosphere.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C109]

 Section D
 Page: 35

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E193.1 The operator shall construct, operate, and maintain this equipment according to the following requirements:

The combustion chamber temperature shall be maintained at a minimum of 1,400 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within plus or minus 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications using an applicable AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,400 degrees Fahrenheit occurs during normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,400 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with an Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]

[Devices subject to this condition: C109]

Section D Page: 36
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E193.2 The operator shall operate and maintain this equipment according to the following requirements:

All pre-puff beads shall be aged for a minimum of 24 hours in this equipment before they are used in the shape molding process.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: D13, D14, D16, D17, D18, D19, D20, D21, D22, D23, D24, D25, D26, D27, D28, D29, D30, D31, D32, D33, D34, D35, D36, D37, D38, D39, D138, D139, D140, D141, D142, D143, D144, D145, D146, D147, D148, D149, D150, D151, D152, D153, D154, D155]

E193.3 The operator shall operate and maintain this equipment according to the following requirements:

The operator shall install and maintain two fixed magnehelic gauges at the inlets of the two booster blowers that vent the aging silos. Each magnehelic gauge shall accurately indicate the differential pressure between the booster blower's inlet and the ambient air.

The operator shall operate and maintain the two booster blower magnehelic gauges at a minimum negative pressure of 1.0 inches of water column at all time except the RTO maintenance period described as in Condition No. E73.1.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C109]

#### H. Applicable Rules

 Section D
 Page: 37

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
NOX	District Rule	1146.2

[RULE 1146.2, 1-9-1998; RULE 1146.2, 1-7-2005]

[Devices subject to this condition: E81, E85, E127]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109

#### [RULE 109, 5-2-2003]

[Devices subject to this condition: E126]

H23.4 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
CO	District Rule	1146

#### [RULE 1146, 11-17-2000]

[Devices subject to this condition: D128]

### K. Record Keeping/Reporting

 Section D
 Page: 38

 Facility I.D.:
 144455

 Revision #:
 DRAFT

 Date:
 November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Certificate of Analysis showing blowing agent content for each lot of expandable polystyrene beads processed in this equipment.

Quarterly raw bead test results following District method 306-91 in cases where the lot tickets have blowing agent content greater than the permit content limit.

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007]

[Devices subject to this condition: D3, D6, D137]

Section H Page: 1
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3 : EXTERNAL CO	OMBUSTI	ION			
System 1 : BOILER					
BOILER, NATURAL GAS, HURST, MODEL S4-G-200-150, WITH LOW NOX BURNER, 8.4 MMBTU/HR A/N: 443517 † Permit to Construct Issued: 05/10/01	D94		NOX: PROCESS UNIT**	CO: 2000 PPMV (5A) [RULE 407,4-2-1982]; CO: 50 PPMV (4) [RULE 1303(a)(1)-BACT,5-10-1996; RULE 1303(a)(1) – BACT,12-6-2002]  CO: 400 PPMV (5) [RULE 1146,11-17-2000]; NOX: 12 PPMV (3) [RULE 2012,5-6-2005]; NOX: 12 PPMV (4) [RULE 2005,5-6-2005]  PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	D29.1, D323.1, D332.1, K40.2

- \* (1) Denotes RECLAIM emission factor
  - (3) Denotes RECLAIM concentration limit
  - (5)(5A)(5B) Denotes command and control emission limit
  - (7) Denotes NSR applicability limit
  - (9) See App B for Emission Limits

- (2) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit

(8)(8A)(8B)Denotes 40 CFR limit(e.g. NSPS, NESHAPS, etc.)

- (10) See Section J for NESHAP/MACT requirements
- \*\* Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

This permit to construct was issued to the previous operator at a prior date. The equipment was constructed and the permit was subsequently transferred to this operator.

Section H Page: 2 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

**SECTION H: DEVICE ID INDEX** 

The following sub-section provides an index to the devices that make up the facility description sorted by device ID.

Section H Page: 3 Facility I.D.: 144455 Revision #: DRAFT Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### **SECTION H: DEVICE ID INDEX**

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D94	1	3	1

Section H Page: 4
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

#### **FACILITY CONDITIONS**

F1.1 The operator shall limit the production rate to no more than 270 ton(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as polystyrene beads.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

- F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - (a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or
  - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Monthly usage of polystyrene beads in tons.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

Section H Page: 5
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

### **PROCESS CONDITIONS**

P13.1 All devices under this process are subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1175

[RULE 1175, 5-13-1994; RULE 1175, 9-7-2007; RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Processes subject to this condition: 1]

### **DEVICE CONDITIONS**

### **D.** Monitoring/Testing Requirements

Section H Page: 6
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D29.1 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
CO emissions	District method 100.1, or approved District portable analyzer and test method	15 minutes	Outlet
NOX emissions	District method 100.1, or approved District portable analyzer and test method	15 minutes	Outlet

The test(s) shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The test shall be conducted to demonstrate compliance with BACT.

In addition to the source test requirements of Section E of this facility permit, the facility permit holder shall submit the protocol to the AQMD engineer no later than 45 days prior to the proposed test date, and notify the District of the date and time of the test at least 10 days prior to the test.

The test shall be conducted when the equipment is operating under at loads of 100, 75 and 50 pecent.

During the source test(s), the facility permit holder shall also measure the oxygen levels in the exhaust, fuel flow rate (CFH), the flue gas rate, and flue gas temperature.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2005, 5-6-2005]

[Devices subject to this condition: D94]

Section H Page: 7
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

### [RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D94]

D332.1 The operator shall determine compliance with the CO emission limit(s) by conducting a test at least once every five years using a portable analyzer and AQMD-approved test method or, if not available, a non-AQMD approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with CO concentration limits. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: D94]

Section H Page: 8
Facility I.D.: 144455
Revision #: DRAFT
Date: November 20, 2009

# FACILITY PERMIT TO OPERATE LIFOAM INDUSTRIES, LLC

#### SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

### K. Record Keeping/Reporting

K40.2 The operator shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District no later than 30 days after the source test was conducted.

Emission data shall be expressed in terms of concentration (ppmv), corrected to 3 percent oxygen, dry basis.

Emission data shall be expressed in terms of mass rate (lbs/hr). In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

Source test results shall also include fuel flow rate under which the test was conducted.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2005, 5-6-2005]

[Devices subject to this condition: D94]